

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Lewis, Raymond C	:	CASE NO.: 5:18-bk-00102-MJC
Lewis, Verna	:	
Debtors.	:	CHAPTER 13

MOTION FOR MODIFICATION OF CHAPTER 13 PLAN AFTER CONFIRMATION

AND NOW come the Debtors, Raymond C. Lewis and Verna Lewis (heretofore referred to as the “Debtors”), by and through their Attorney, Patrick J. Best, Esquire, of ARM Lawyers, who respectfully moves this Honorable Court as follows:

1. On January 12, 2018 the Debtors filed an original Chapter 13 Plan with this Honorable Court.
2. On June 12, 2018 the Debtors filed a First Amended Chapter 13 Plan with this Honorable Court.
3. On August 22, 2018, this Honorable Court entered an Order Confirming the Debtors’ First Amended Chapter 13 Plan.
4. The Debtors intend on filing a Third Amended Chapter 13 Plan as a result of the following events:
 - a. The Debtors' Plan calls for them to refinance their property; however, they have been unable to secure financing. As a result, Debtors' are seeking to modify the Plan accordingly.
5. In accordance with F.R.B.P 3015(g) this Honorable Court requires the filing of a Motion to Modify or Amend the Chapter 13 Plan in order to confirm the Third Amended Chapter 13 Plan with the Court.

WHEREFORE, Debtors respectfully requests that this Honorable Court enter and Order confirming the Debtors’ Third Amended Chapter 13 Plan.

Date: March 14, 2023

/s/ Patrick J. Best
Patrick J. Best, Esquire
ARM Lawyers
18 N 8th Street
Stroudsburg, PA 18360
Attorney for Debtors